



IN THE
Supreme Court of the United States
OCTOBER TERM, 1978

No. 78-238

RONALD DICK,

Petitioner,

v.

THE UNITED STATES,

Respondent.

**MOTION FOR LEAVE TO FILE AND PETITION
FOR WRIT OF PROHIBITION**

REPLY BRIEF

Pro Se
RONALD DICK
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Silver Spring, Maryland 20904
Tel: (301) 384-7234

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REPLY BRIEF

1412 Chilton Drive
Silver Spring, MD 20904
September 18, 1978

Clerk
Supreme Court of the United States
Washington, D. C. 20543

Re: Dick v. U.S. 78-238; Agreement with Solicitor
General.

Dear Sir:

I have received late a "Memorandum for the United

States in Opposition" to my Motion. I agree with the arguments set forth by Wade H. McCree, Jr., Solicitor General, if the United States Court of Appeals for the Fourth Circuit, Dick v. Califano, No. 78-1400, has jurisdiction over the total question in this case and/or the District of Columbia Doctor, James Wellhouse.

Hence, petitioner now alleges primary jurisdiction by the Fourth Circuit, and I have served by certified mail that Circuit with four copies of the Motion in 78-238 as part of a conference motion to the Fourth Circuit. However, the U. S. Attorney for Califano denies Fourth Circuit jurisdiction, and he is joined by the U. S. Attorney for Dr. Wellhouse in U. S. ex rel Dick v. Wellhouse, C.A. D.C. No. 78-1350, who claims a D.C. Circuit question cannot be united to 78-1400 in the Fourth Circuit.

For these reasons, I ask the question in U.S.S.C. 78-238 be transferred under 28 U.S.C. §2241(b) to the Fourth Circuit at 78-1400 (or for reconsideration in the D.C. Circuit at 78-1350) if the receiving Court has jurisdiction. If neither of these two Appeal Courts has jurisdiction on the total question, I request the case stay before the Supreme Court unless the Solicitor General or this Court has a better solution.

Sincerely yours,

/s/ Ronald Dick 9/18/78
RONALD DICK
Petitioner, Pro Se.
Tel: (301) 384-7234

c.c.: Solicitor General
U.S. Attorney, Baltimore
U.S. Attorney, D.C.

UNITED STATES COURT OF APPEALS FOR THE
4TH CIRCUIT

RONALD DICK,
Appellant,

v.

No. 78-1400
(C/A 76-512)

JOSEPH A. CALIFANO, et al.,
Appellees.

MOTION FOR CONFERENCE WITH COURT AND
APPELLEES FOR TWO REASONS.

1. Appellant calls for a conference based on Appellee Alan Campbell's (CSC) letter of July 13, 1978, finding appellant "restored to earning capacity" which changes the nature of this case significantly.
2. Appellant calls for a conference based on Appellant's filing on August 10, 1978, with the United States Supreme Court in Washington, D.C. at 78-238.
3. Appellant suggests a meeting as soon as possible at the time and place set by the Court, and all matters be stayed until that meeting.

/s/ Ronald Dick 8/15/78
RONALD DICK
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Ex: USC 78-238